

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF GEORGIA**

In re:

Case No. 22-50035-JPS

Teri Galardi,

Chapter 11

Debtor,

\_\_\_\_\_ /

**MOTION TO CONTINUE SEPTEMBER 6, 2023 HEARING**

COMES NOW Creditor Shakir Williams, (hereinafter “Williams”), by and through her assignee, and moves to continue the September 6, 2023 Hearing to the September 27, 2023 Hearing Date and in support thereof states as follows:

1. There were two matters to be heard at the September 6, 2023 Hearing: the first is a hearing on an objection to the transfer of the claim of Shakir Williams [[Doc. 500](#)] and the second is a motion to reconsider [[Doc. 520](#)].

2. Mr. McClendon agreed to continue the motion to reconsider until September 27, 2023 when asked by the attorney who filed the motion, Jason Orenstein.

3. Mr. McClendon failed to respond to the undersigned when he requested a continuance of the first matter to the September 27, 2023.

4. The Court advised the parties that the hearing can be telephonic to the extent it is solely legal argument but needed to be in person to the extent that witnesses or evidence needs to be taken.

5. To the extent that Mr. McClendon is not challenging the authenticity of the transfer of the Shakir Williams Proof of Claim # 98 and attached assignment [[Doc. 496](#)], then there is no need for the live testimony from Ms. Williams and the hearing can proceed telephonically.

6. Mr. McClendon filed a reply in support of his motion on August 30, 2023 but Mr. McClendon served his reply on undersigned via regular mail (as opposed to email) and it was received on September 5, 2023.

7. Undersigned has not had ample time to review the reply and research the cases and the authorities cited in the reply to rebut them in oral argument.

8. Accordingly, undersigned is not prepared to attend a telephonic hearing and address the legal arguments raised in the objection and reply because he received the reply today on the eve of the hearing.

9. Mr. McClendon should have emailed the reply when he filed it last week. Undersigned routinely serves Mr. McClendon via email so that he receives filings in a timely manner.


10. There are already several matters set for September 27, 2023 and adding this matter to that calendar will be more efficient for the parties and the court. It will also allow the undersigned ample time to make travel arrangements to Macon, GA from Pennsylvania.

11. This motion is not submitted for the purposes of delay and the continuance will not prejudice any party.

WHEREFORE, the undersigned assignee respectfully requests that the Court enter an order continuing the objection to transfer [[Doc. 500](#)] to the September 27, 2023 hearing and that this Court grant any such other and further relief this Court may deem just and proper.

Dated September 5, 2023

Respectfully submitted,

	 <hr/> <p>Chris Kosachuk <i>Pro Se Assignee</i> 854 Pheasant Run Rd. West Chester, PA 19382-8144 (305) 490-5700 <a href="mailto:chriskosachuk@gmail.com">chriskosachuk@gmail.com</a></p>

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 5th day of September 2023, a true and correct copy of the foregoing was electronically file with the Court's CM/ECF system which will serve a copy of the foregoing document on all parties of record and was served via email on Thomas McClendon, as Liquidating Trustee of the Galardi Creditors Trust.

Respectfully submitted,



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Chris Kosachuk  
*As Pro Se Assignee of Respondent Shakir Williams*  
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West Chester, PA 19382-8144  
(305) 490-5700  
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**SERVICE LIST**

**Served via CM/ECF**  
All parties of record